

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DISTRICT

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY,

Plaintiff,

Case No. 14-10266  
Hon. Judith E. Levy  
Magistrate Judge David Grand

v.

UNIVERSAL HEALTH GROUP, INC.  
A/K/A MICHIGAN SPINE AND REHAB,  
UHG MANAGEMENT, LLC,  
PROFESSIONAL HEALTH SYSTEMS,  
LLC A/K/A PROFESSIONAL MEDICAL  
BILLING, LLC, SCOTT P. ZACK, D.C.,  
DAVID M. KATZ, D.C.,  
LOREN C. CHUDLER, D.O.,  
JOSEPH F. DESANTO, HORIZON  
IMAGING, LLC, CLEAR IMAGING, LLC,  
JEFF S. PIERCE, D.O.,  
THOMAS D. CARUSO, D.O., and  
KATHERINE H. KARO, D.O.,

Defendants.

---

**STIPULATION FOR EXTENSION OF PAGE LIMITS  
FOR STATE FARM'S JOINT RESPONSE IN OPPOSITION TO DEFENDANTS'  
MOTIONS TO DISMISS AND JOINDERS**

This matter is brought before the Court upon the Stipulation of the undersigned parties and the Court is otherwise duly informed in the premises: THE UNDERSIGNED PARTIES ACKNOWLEDGE that (a) Plaintiff State Farm Mutual Automobile Insurance Company ("State Farm") has filed a Complaint containing 285 paragraphs and attaching 21 Exhibits; (b) multiple defendants have filed separate motions to dismiss State Farm's Complaint, including (i) Defendants Scott P. Zack,

D.C. and David M. Katz, D.C. (*see Dkt. No. 45*); (ii) Defendant Loren C. Chudler, D.O. (*see Dkt. No. 46*); (iii) Defendants Universal Health Group, UHG Management, and Professional Medical Billing, LLC (*see Dkt. Nos. 49*); and (iv) Defendant Joseph F. DeSanto (*see Dkt. No. 53*); and (c) other defendants have filed “joinders” in some or all of the foregoing motions to dismiss, including Defendants Horizon Imaging, LLC and Clear Imaging, LLC (*see Dkt. No. 47*). The parties acknowledge that, pursuant to the Court’s Order dated April 3, 2014 (*see Dkt. No. 35*), State Farm is entitled to file a 60-page response brief to Defendants Scott P. Zack, D.C. and David M. Katz, D.C.’s Motion to Dismiss. The parties acknowledge that, in the interests of efficiency and convenience for the Court, State Farm wishes to respond to the foregoing docket entries – Dkt. Nos. 45, 46, 47, 49, and 53 – in a single, combined brief for which additional pages are needed to respond to Defendants’ arguments. The parties further acknowledge that pursuant to Local Rule 7.1(d)(3), State Farm would be entitled to more than 100 pages if it responded to docket entries 45, 46, 47, 49, and 53 separately.

THEREFORE IT IS HEREBY STIPULATED AND AGREED that the page limit for State Farm’s Joint Response in Opposition to Defendants’ Motions to Dismiss and Joinders (Dkt. Nos. 45, 46, 47, 49, and 53) shall be extended by 20 pages beyond the 60 pages allotted by the Court’s April 3, 2014 Order – for a total of 80 pages.

IT IS HEREBY ORDERED that State Farm is permitted to file a Joint Response in Opposition to Defendants’ Motions to Dismiss and Joinders (Dkt. Nos. 45, 46, 47, 49, and 53) that shall not exceed 80 pages in length.

**SO ORDERED.**

Dated: May 15, 2014

s/Judith E. Levy  
JUDITH E. LEVY  
U. S. DISTRICT JUDGE

**AGREED AND CONSENTED TO BY:**

**MILLER CANFIELD PADDOCK & STONE PLC**

By: /s/ Thomas W. Cranmer  
Thomas W. Cranmer (P25252)

*Attorney for Plaintiff State Farm Mutual Automobile Insurance Company*

Dated: May 14, 2014

**KATTEN MUCHIN ROSENMAN LLP**

By: /s/ Jared T. Heck  
Jared T. Heck (IL 6289711)  
*Attorney for Plaintiff State Farm Mutual Automobile Insurance Company*

Dated: May 14, 2014

**BUTZEL LONG, a professional corporation**

By: /s/ Michael J. Lavoie  
Michael J. Lavoie (P32584)  
*Attorney for Defendants Scott P. Zack, D.C. and David M. Katz, D.C.*

Dated: May 14, 2014

**JOELSON ROSENBERG PLC**

By: /s/ Peter W. Joelson  
Peter W. Joelson (P51468)  
*Attorney for Defendants Jeff S. Pierce, D.O. and Thomas D. Caruso, D.O.*

Dated: May 14, 2014

**LAW OFFICES OF BEN GONEK**

By: /s/ Ben M. Gonek  
Ben M. Gonek (P43716)  
*Attorney for Defendants Universal Health Group; UHG Management; and Professional Medical Billing, LLC*

Dated: May 14, 2014

**KOTZ SANGSTER WYSOCKI PC**

By: /s/ Jovan Dragovic  
*Attorney for Defendant Loren Chudler, D.O.*

Dated: May 14, 2014

**STARK REAGAN PC**

By: /s/ Peter Arvant

*Attorney for Defendants Horizon Imaging, LLC and Clear Imaging, LLC*

Dated: May 14, 2014

**FINK AND ASSOCIATES LAW**

By: /s/ David H. Fink

*Attorney for Defendant Joseph F. DeSanto*

Dated: May 14, 2014